

## Executive Branch Personnel Public Financial Disclosure Report (OGE Form 278e)

### Filer's Information

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**Nicholas, Kirk**

Sen. Advisor, Department of Veterans Affairs

Date of Appointment: 09/12/2017

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Other Federal Government Positions Held During the Preceding 12 Months:

None

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Electronic Signature - I certify that the statements I have made in this form are true, complete and correct to the best of my knowledge.

**/s/ Nicholas, Kirk [electronically signed on 10/14/2017 by Nicholas, Kirk in Integrity.gov]**

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Agency Ethics Official's Opinion - On the basis of information contained in this report, I conclude that the filer is in compliance with applicable laws and regulations (subject to any comments below).

**/s/ Barnett, Bruce E, Certifying Official [electronically signed on 01/19/2018 by Barnett, Bruce E in Integrity.gov]**

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Other review conducted by

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U.S. Office of Government Ethics Certification

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Data Revised 01/19/2018

Data Revised 01/14/2018

Data Revised 01/07/2018

Data Revised 01/02/2018

Data Revised 10/18/2017

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## 1. Filer's Positions Held Outside United States Government

#	ORGANIZATION NAME	CITY, STATE	ORGANIZATION TYPE	POSITION HELD	FROM	TO
1	CALIBRE Systems Inc	Alexandria, Virginia	Corporation	consultant	2/2015	8/2017

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## 2. Filer's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	USAA CONEERSTONE MOD AGGRESSIVE RETAIL	Yes	\$15,001 - \$50,000		\$15,001 - \$50,000

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## 3. Filer's Employment Agreements and Arrangements

None

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## 4. Filer's Sources of Compensation Exceeding \$5,000 in a Year

#	SOURCE NAME	CITY, STATE	BRIEF DESCRIPTION OF DUTIES
1	CALIBRE Systems Inc	Alexandria, Virginia	

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## 5. Spouse's Employment Assets & Income and Retirement Accounts

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	AMERICAN CAPITAL WORLD BOND CL F3	Yes			\$201 - \$1,000
2	AMERICAN EUROPACIFIC GROWTH CL F3	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
3	BRIDGE BUILDER CORE BOND	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
4	BRIDGE BUILDER CORE PLUS BOND	Yes	\$1,001 - \$15,000		\$201 - \$1,000
5	BRIDGE BUILDER LARGE GROWTH	Yes	\$1,001 - \$15,000		\$201 - \$1,000
6	BRIDGE BUILDER LARGE VALUE	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
7	BRIDGE BUILDER SMALLMID GROWTH	Yes			\$201 - \$1,000
8	BRIDGE BUILDER SMALLMID VALUE	Yes	\$1,001 - \$15,000		\$201 - \$1,000
9	DIMENSIONAL DFA INTERNATIONAL VALUE FUND	Yes	\$15,001 - \$50,000		\$201 - \$1,000
10	DODGE & COX STOCK FUND	Yes			\$201 - \$1,000
11	FRANKLIN MUTUAL SHARES CLASS R6	Yes	\$15,001 - \$50,000		\$201 - \$1,000
12	JOHN HANCOCK DISCIPLINED VALUE MID CAP FUND CL R6	Yes	\$1,001 - \$15,000		\$201 - \$1,000
13	JPMORGAN US GOVERNMENT MONEY MARKET FUND CAPITAL CL	Yes	\$1,001 - \$15,000		\$201 - \$1,000
14	METROPOLITAN WEST FUNDS TOTAL RETURN BOND FUND CL I	Yes	\$15,001 - \$50,000		\$1,001 - \$2,500
15	MFS INTERNATIONAL VALUE FUND CLASS R6	Yes	\$1,001 - \$15,000		\$201 - \$1,000
16	PIMCO FUNDS TOTAL RETURN FUND IV INST CL	Yes	\$1,001 - \$15,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
17	PRUDENTIAL HIGH YIELD FUND CL Q	Yes	\$1,001 - \$15,000		None (or less than \$201)
18	PRUDENTIAL JENNISON MID-CAP GROWTH FUND INC CL Q	Yes	\$1,001 - \$15,000		None (or less than \$201)
19	ROYCE PREMIER FUND INSTITUTIONAL CL	Yes	\$1,001 - \$15,000		None (or less than \$201)
20	T ROWE PRICE INSTITUTIONAL LARGE CAP GROWTH FUND	Yes	\$15,001 - \$50,000		\$201 - \$1,000
21	T ROWE PRICE INTERNATIONAL DISCOVERY FUND CL I	Yes	\$1,001 - \$15,000		None (or less than \$201)
22	VICTORY SYCAMORE SMALL COMPANY OPPORTUNITY FUND CLASS I	Yes	\$1,001 - \$15,000		\$201 - \$1,000
23	AMERICAN CAPITAL WORLD BOND CL F3	Yes	None (or less than \$1,001)		None (or less than \$201)
24	BRIDGE BUILDER CORE PLUS BOND	Yes	\$1,001 - \$15,000		None (or less than \$201)
25	BRIDGE BUILDER INTL EQUITY	Yes	\$1,001 - \$15,000		None (or less than \$201)
26	BRIDGE BUILDER LARGE GROWTH	Yes	\$1,001 - \$15,000		None (or less than \$201)
27	BRIDGE BUILDER LARGE VALUE	Yes	\$1,001 - \$15,000		None (or less than \$201)
28	BRIDGE BUILDER SMALLMID GROWTH	Yes	\$1,001 - \$15,000		None (or less than \$201)
29	GOLDMAN SACHS FINANCIAL SQUARE GOVERNMENT FUND INSTL CL	Yes	None (or less than \$1,001)		None (or less than \$201)
30	T ROWE PRICE HIGH YIELD CLASS I	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
31	ISHARES CORE US AGGREGATE BOND ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
32	ISHARES MSCI EAFE FUND	Yes	\$1,001 - \$15,000		None (or less than \$201)
33	ISHARES RUSSELL 1000 FUND	Yes	\$1,001 - \$15,000		\$201 - \$1,000
34	ISHARES RUSSELL MIDCAP VALUE FUND	Yes	\$1,001 - \$15,000		None (or less than \$201)
35	ISHARES S&P 100 FUND	Yes	\$1,001 - \$15,000		None (or less than \$201)
36	ISHARES TRUST RUSSELL 2000 VALUE FUND	Yes	\$1,001 - \$15,000		None (or less than \$201)
37	VANGUARD FTSE ALL-WORLD EX-US SMALL-CAP INDEX ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
38	VANGUARD INTER TERM BD ETF	Yes	\$1,001 - \$15,000		None (or less than \$201)
39	AMERICAN FUNDAMENTAL INVESTORS CL F3	Yes	\$15,001 - \$50,000		\$201 - \$1,000
40	AMERICAN FUNDS TAX EXEMPT BOND F3	Yes	\$15,001 - \$50,000		\$201 - \$1,000
41	BLACKROCK EQUITY DIVIDEND FUND INSTITUTIONAL CLASS	Yes	\$15,001 - \$50,000		\$201 - \$1,000
42	BRIDGE BUILDER MUNICIPAL BOND CL I	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
43	COLUMBIA ACORN INTERNATIONAL CL I3	Yes	\$15,001 - \$50,000		\$201 - \$1,000
44	DODGE & COX INTERNATIONAL STOCK FUND	Yes	\$15,001 - \$50,000		\$201 - \$1,000
45	DODGE & COX STOCK FUND	Yes	\$1,001 - \$15,000		None (or less than \$201)

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
46	EATON VANCE ATLANTA CAP SMID CAP FUND CL I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
47	HARBOR CAPITAL APPRECIATION RETIREMENT CL	Yes	\$1,001 - \$15,000		None (or less than \$201)
48	HOTCHKIS & WILEY MID CAP VALUE FUND CL I	Yes	\$15,001 - \$50,000		\$201 - \$1,000
49	INVESCO COMSTOCK CL R6	Yes	\$15,001 - \$50,000		\$201 - \$1,000
50	INVESCO INTERNATIONAL GROWTH CLASS R6	Yes	\$15,001 - \$50,000		\$201 - \$1,000
51	INVESCO INTERNATIONAL GROWTH CLASS R6	Yes	\$15,001 - \$50,000		\$201 - \$1,000
52	JPMORGAN FEDERAL MONEY MARKET FUND INSTITUTIONAL CL	Yes	\$1,001 - \$15,000		None (or less than \$201)
53	MFS SERIES TRUST II GROWTH FUND CL R6	Yes	\$15,001 - \$50,000		\$201 - \$1,000
54	PRIMECAP ODYSSEY STOCK FUND	Yes	\$1,001 - \$15,000		None (or less than \$201)
55	THORNBURG LIMITED TERM MUNICIPAL FUND CL I	Yes	\$15,001 - \$50,000		None (or less than \$201)
56	ISHARES RUSSELL 1000 VALUE FUND	Yes	\$15,001 - \$50,000		\$201 - \$1,000
57	VANGUARD FTSE DEVELOPED MARKETS ETF	Yes	\$50,001 - \$100,000		\$1,001 - \$2,500
58	VANGUARD SMALL CAP GROWTH ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000
59	VANGUARD SMALL CAP VALUE ETF	Yes	\$15,001 - \$50,000		\$201 - \$1,000

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
60	Employment Income	See Endnote	N/A		\$100,001 - \$1,000,000

## 6. Other Assets and Income

#	DESCRIPTION	EIF	VALUE	INCOME TYPE	INCOME AMOUNT
1	checking account	No	\$1,001 - \$15,000		None (or less than \$201)
2	Savings	No	\$1,001 - \$15,000		None (or less than \$201)
3	checking	No	\$1,001 - \$15,000		None (or less than \$201)

## 7. Transactions

(N/A) - Not required for this type of report

## 8. Liabilities

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
1	Bank of America	Mortgage on Personal Residence	\$100,001 - \$250,000	2006	3.625	30 year
2	USAA	car	\$15,001 - \$50,000	2015	2.49	72 months

#	CREDITOR NAME	TYPE	AMOUNT	YEAR INCURRED	RATE	TERM
3	Toyota Financial	Lease	\$15,001 - \$50,000	2015	N/A	36months
4	Discover	Credit Card	\$10,001 - \$15,000	2012	12.5	Annual
5	Hilton Grand Vacation Club	Mortgage on Personal Residence	\$15,001 - \$50,000	2000	9.5%	120 months
6	SoFi	Personal Loan	\$50,001 - \$100,000	2015	10.125%	84 months
7	Federal Government	Taxes	\$15,001 - \$50,000	1987	6.25%	60 months

## 9. Gifts and Travel Reimbursements

(N/A) - Not required for this type of report

## Endnotes

PART	#	ENDNOTE
5.	60	Spouse's closeout income from former employment with BMGI. She left work in Aug of 2016, the payout was made in 2017.

# Summary of Contents

## 1. Filer's Positions Held Outside United States Government

Part 1 discloses positions that the filer held at any time during the reporting period (excluding positions with the United States Government). Positions are reportable even if the filer did not receive compensation.

This section does not include the following: (1) positions with religious, social, fraternal, or political organizations; (2) positions solely of an honorary nature; (3) positions held as part of the filer's official duties with the United States Government; (4) mere membership in an organization; and (5) passive investment interests as a limited partner or non-managing member of a limited liability company.

## 2. Filer's Employment Assets & Income and Retirement Accounts

Part 2 discloses the following:

- Sources of earned and other non-investment income of the filer totaling more than \$200 during the reporting period (e.g., salary, fees, partnership share, honoraria, scholarships, and prizes)
- Assets related to the filer's business, employment, or other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

## 3. Filer's Employment Agreements and Arrangements

Part 3 discloses agreements or arrangements that the filer had during the reporting period with an employer or former employer (except the United States Government), such as the following:

- Future employment
- Leave of absence
- Continuing payments from an employer, including severance and payments not yet received for previous work (excluding ordinary salary from a current employer)
- Continuing participation in an employee welfare, retirement, or other benefit plan, such as pensions or a deferred compensation plan
- Retention or disposition of employer-awarded equity, sharing in profits or carried interests (e.g., vested and unvested stock options, restricted stock, future share of a company's profits, etc.)

#### **4. Filer's Sources of Compensation Exceeding \$5,000 in a Year**

Part 4 discloses sources (except the United States Government) that paid more than \$5,000 in a calendar year for the filer's services during any year of the reporting period.

The filer discloses payments both from employers and from any clients to whom the filer personally provided services. The filer discloses a source even if the source made its payment to the filer's employer and not to the filer. The filer does not disclose a client's payment to the filer's employer if the filer did not provide the services for which the client is paying.

#### **5. Spouse's Employment Assets & Income and Retirement Accounts**

Part 5 discloses the following:

- Sources of earned income (excluding honoraria) for the filer's spouse totaling more than \$1,000 during the reporting period (e.g., salary, consulting fees, and partnership share)
- Sources of honoraria for the filer's spouse greater than \$200 during the reporting period
- Assets related to the filer's spouse's employment, business activities, other income-generating activities that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in income during the reporting period (e.g., equity in business or partnership, stock options, retirement plans/accounts and their underlying holdings as appropriate, deferred compensation, and intellectual property, such as book deals and patents)

This section does not include assets or income from United States Government employment or assets that were acquired separately from the filer's spouse's business, employment, or other income-generating activities (e.g., assets purchased through a brokerage account). Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF). Amounts of income are not required for a spouse's earned income (excluding honoraria).

#### **6. Other Assets and Income**

Part 6 discloses each asset, not already reported, that (1) ended the reporting period with a value greater than \$1,000 or (2) produced more than \$200 in investment income during the reporting period. For purposes of the value and income thresholds, the filer aggregates the filer's interests with those of the filer's spouse and dependent children.

This section does not include the following types of assets: (1) a personal residence (unless it was rented out during the reporting period); (2) income or retirement benefits associated with United States Government employment (e.g., Thrift Savings Plan); and (3) cash accounts (e.g., checking, savings, money market accounts) at a single financial institution with a value of \$5,000 or less (unless more than \$200 of income was produced). Additional exceptions apply. Note: The type of income is not required if the amount of income is \$0 - \$200 or if the asset qualifies as an excepted investment fund (EIF).

#### **7. Transactions**

Part 7 discloses purchases, sales, or exchanges of real property or securities in excess of \$1,000 made on behalf of the filer, the filer's spouse or dependent child during reporting period.

This section does not include transactions that concern the following: (1) a personal residence, unless rented out; (2) cash accounts (e.g., checking, savings, CDs, money market accounts) and money market mutual funds; (3) Treasury bills, bonds, and notes; and (4) holdings within a federal Thrift Savings Plan account. Additional exceptions apply.

## **8. Liabilities**

Part 8 discloses liabilities over \$10,000 that the filer, the filer's spouse or dependent child owed at any time during the reporting period.

This section does not include the following types of liabilities: (1) mortgages on a personal residence, unless rented out (limitations apply for PAS filers); (2) loans secured by a personal motor vehicle, household furniture, or appliances, unless the loan exceeds the item's purchase price; and (3) revolving charge accounts, such as credit card balances, if the outstanding liability did not exceed \$10,000 at the end of the reporting period. Additional exceptions apply.

## **9. Gifts and Travel Reimbursements**

This section discloses:

- Gifts totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.
- Travel reimbursements totaling more than \$390 that the filer, the filer's spouse, and dependent children received from any one source during the reporting period.

For purposes of this section, the filer need not aggregate any gift or travel reimbursement with a value of \$156 or less. Regardless of the value, this section does not include the following items: (1) anything received from relatives; (2) anything received from the United States Government or from the District of Columbia, state, or local governments; (3) bequests and other forms of inheritance; (4) gifts and travel reimbursements given to the filer's agency in connection with the filer's official travel; (5) gifts of hospitality (food, lodging, entertainment) at the donor's residence or personal premises; and (6) anything received by the filer's spouse or dependent children totally independent of their relationship to the filer. Additional exceptions apply.

## Privacy Act Statement

Title I of the Ethics in Government Act of 1978, as amended (the Act), 5 U.S.C. app. § 101 et seq., as amended by the Stop Trading on Congressional Knowledge Act of 2012 (Pub. L. 112-105) (STOCK Act), and 5 C.F.R. Part 2634 of the U. S. Office of Government Ethics regulations require the reporting of this information. The primary use of the information on this report is for review by Government officials to determine compliance with applicable Federal laws and regulations. This report may also be disclosed upon request to any requesting person in accordance with sections 105 and 402(b)(1) of the Act or as otherwise authorized by law. You may inspect applications for public access of your own form upon request. Additional disclosures of the information on this report may be made: (1) to any requesting person, subject to the limitation contained in section 208(d)(1) of title 18, any determination granting an exemption pursuant to sections 208(b)(1) and 208(b)(3) of title 18; (2) to a Federal, State, or local law enforcement agency if the disclosing agency becomes aware of violations or potential violations of law or regulation; (3) to another Federal agency, court or party in a court or Federal administrative proceeding when the Government is a party or in order to comply with a judge-issued subpoena; (4) to a source when necessary to obtain information relevant to a conflict of interest investigation or determination; (5) to the National Archives and Records Administration or the General Services Administration in records management inspections; (6) to the Office of Management and Budget during legislative coordination on private relief legislation; (7) to the Department of Justice or in certain legal proceedings when the disclosing agency, an employee of the disclosing agency, or the United States is a party to litigation or has an interest in the litigation and the use of such records is deemed relevant and necessary to the litigation; (8) to reviewing officials in a new office, department or agency when an employee transfers or is detailed from one covered position to another; (9) to a Member of Congress or a congressional office in response to an inquiry made on behalf of an individual who is the subject of the record; (10) to contractors and other non-Government employees working on a contract, service or assignment for the Federal Government when necessary to accomplish a function related to an OGE Government-wide system of records; and (11) on the OGE Website and to any person, department or agency, any written ethics agreement filed with OGE by an individual nominated by the President to a position requiring Senate confirmation. See also the OGE/GOVT-1 executive branch-wide Privacy Act system of records.

## Public Burden Information

This collection of information is estimated to take an average of three hours per response, including time for reviewing the instructions, gathering the data needed, and completing the form. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Program Counsel, U.S. Office of Government Ethics (OGE), Suite 500, 1201 New York Avenue, NW., Washington, DC 20005-3917.

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